

# OSBORN LAW P.C.

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**MEMO ENDORSED**

March 19, 2024

**VIA ECF**

Honorable Barbara C. Moses  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Application GRANTED. SO ORDERED.



Barbara Moses  
United States Magistrate Judge  
March 19, 2024

Re: *Pulla v. Commissioner of Social Security*  
Civil Action No. 1:23-cv-10962-BCM

Dear Judge Moses,

We write on behalf of our client, Narcisa Pulla, with the consent of the defense, to request additional time to file her motion for judgment on the pleadings which is currently due on March 21, 2024, per the Court's December 20, 2023 Standing Order. This is the parties' first request for an extension. The reason for this request is that Plaintiff's counsel currently has overlapping Social Security deadlines, oral arguments, and status conferences.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file her ~~motion for judgment on the pleadings~~ <sup>brief (see Supp. Soc. Sec. R. 5)</sup> on or before: **June 19, 2024;**
- Defendant to file its ~~response to plaintiff's motion/cross motion~~ <sup>brief</sup> on or before: **August 19, 2024;** and
- Plaintiff to file her reply, if any, on or before: **September 2, 2024.**

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Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn  
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cc: Fergus John Kaiser, Esq. (by ECF)